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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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	:
MIGUEL A. DE JESUS,	:
	:
Plaintiff,	:
vs.	:
	:
RBS /ABN AMRO, INC.,	:
	:
Defendant.	:
	:
----- X	

CASE NO.: 12-cv-04395 (WJM) (MF)
**NOTICE OF MOTION
TO DISMISS THE COMPLAINT**

TO: Miguel A. de Jesus, *pro se*
6 Deer Track Drive
East Stroudsburg, PA 18302

PLEASE TAKE NOTICE that on **September 4, 2012 at 10:00 a.m.**, or as soon thereafter as counsel may be heard, the undersigned attorneys for defendant The Royal Bank of Scotland N.V., shall move before the Honorable William J. Martini, U.S.D.J., at the United States District Court of New Jersey located at Martin Luther King, Jr. Federal Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101, for an Order, pursuant to Federal Rule of Civil Procedure 12(b)(6), dismissing the Complaint of *pro se* plaintiff Miguel A. de Jesus.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Defendant will rely on the Memorandum of Law in Support of Defendant's Motion to Dismiss the Complaint and the Declaration of John P. Barry, Esq., filed herewith.

PLEASE TAKE FURTHER NOTICE that a proposed form of order is submitted herewith.

Dated: July 30, 2012
Newark, New Jersey

PROSKAUER ROSE LLP

s/ John P. Barry
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